



DATE: November 17, 1983

TO: Division File

FROM: Craig J. Liska

SUBJECT: 19780304 - Will County - Lemont/Union Oil Company
Subpart F Groundwater Monitoring

US EPA RECORDS CENTER REGION 5



426944

The subject facility maintains a land farming operation that is regulated under Subpart F. Leo Erchull, Environmental Science Analyst for Union Oil was contacted at the time of my September 23, 1983 inspection. Mr. Erchull believes that the sludge that is currently being land applied is non-hazardous, based upon their numerous analyses. Mr. Erchull stated that a ground-water monitoring system was installed because a listed hazardous waste, (K051) API separator sludge, was land applied for approximately six months following the effective date of RCRA Regulations.

The existing land application area consists of one sludge drying bed, and three active sludge landspreading areas immediately to the west and north of the drying bed (Figure 2). One additional land application area on the site can be used for potential future landspreading activities. Upgradient well MW-1 is located along the easternmost boundary of this future land farm area. Mr. Erchull stated that landspreading activities have never occurred in this area.

Union Oil started sampling their wells in June, 1981; however, they neglected to run replicate samples for the contamination indicator parameters. Union Oil became aware of the deficiency and began running replicate samples in the last quarter of 1982. Pesticides and radioactivity parameters that were missed during the first year are scheduled to be completed by the end of September, 1983. Essentially, all first year sampling requirements will be fulfilled after the September, 1983 sampling. Mr. Erchull intends to perform the Student's t-test with samples he will obtain in December, 1983.

One of the deficiencies noted during my inspection was that the facility's groundwater quality assessment program was inadequately outlined. The outline failed to describe a program capable of determining whether hazardous waste constituents have entered the groundwater, the rate and extent of their migration and their concentrations. Mr. Erchull stated that he agreed, and that he had been trying to convince the corporate office to develop a more descriptive outline.